

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Judge **Mahon**

UNITED STATES OF AMERICA

- v. -

JAIME MONDRAGON,

Defendant.

INFORMATION

08 Cr.

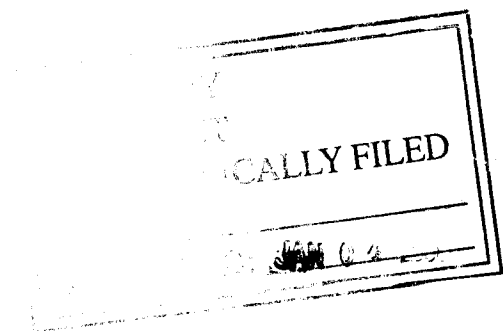
08 CRIM 024

COUNT ONE

The United States Attorney charges:

1. From in or about May 2007 through on or about September 23, 2007, in the Southern District of New York and elsewhere, JAIME MONDRAGON, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JAIME MONDRAGON, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 500 grams and more of mixtures and



substances containing a detectable amount of heroin, in violation of Sections 812, 841(a)(1), and 841(b)(1)(B) of Title 21, United States Code.

3. It was a further part and an object of the conspiracy that JAIME MONDRAGON, the defendant, and others known and unknown, would and did import into the customs territory of the United States from a place outside thereof, a controlled substance, to wit, 500 grams and more of mixtures and substances containing a detectable amount of heroin, in violation of Section 952 of Title 21, United States Code.

OVERT ACTS

4. In furtherance of the conspiracy to effect the illegal objects thereof, the following overt act, among others, was committed in the Southern District of New York:

a. On or about September 23, 2007, JAIME MONDRAGON, the defendant, carried 520.9 grams of heroin, which was hidden inside of a laptop computer and battery charger, on a commercial flight that landed in Miami, Florida, for the purpose of then delivering those drugs to a person in New York City.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION AS TO COUNT ONE

5. As a result of committing the controlled substance offense alleged in Count One of this Information, JAIME MONDRAGON, the defendant, shall forfeit to the United States

pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Information.

Substitute Assets Provision


6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendant up to the value of the above
forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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